

# EXHIBIT 1

Affidavit of Jamie Coe

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

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JAMIE COE,

File No. 1:20-CV-\_\_\_\_\_

Hon.

Plaintiff,

v.

TRINITY HEALTH-MICHIGAN  
d/b/a  
MERCY HEALTH ST. MARY'S,  
MERCY HEALTH, and ST.  
MARY'S HOSPITAL,

Defendants.

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**AFFIDAVIT OF JAMIE COE**

Jamie Coe states:

1. I am a citizen of Syria.
2. I am married, and my wife is also a citizen of Syria.
3. My wife and I currently living in the United States, but many of our close family members continue to live in Syria.
4. Because my J-1 status either has been cancelled or is in immediate danger of cancellation, my wife and I are currently pursuing asylum relief before the U.S. Department of Homeland Security, given our fear of return to Syria.

5. If our request for this relief is ultimately denied, we will likely be forced to return to Syria.

6. My wife and I are Muslim and we follow the Islamic faith.

7. I am Alawite and my wife is Sunni (both sects of Muslim).

8. Most of our family members and most of the individuals in our communities in Syria are also Muslim.

9. Within the Muslim faith, adultery and sexual activity outside of marriage is forbidden.

10. Individuals who have committed adultery or other sexual misconduct may suffer severe consequences up to death (to be killed in Honor crime situation).

11. Even being accused of adultery or sexual misconduct in Syria will give the wrong idea and people will not wait for explanations.

12. I have a legitimate and well-founded fear that if individuals in Syria knew about the allegations made against me, even though I maintain that they are untrue, I and my family could face physical violence and physical harm if my name was seen in a public complaint related to this issue.

13. Having my name attached to a public complaint that addresses allegations of sexual misconduct and adultery against me will put me and my family at risk when we return to Syria.

Dated: August 3, 2020



Jamie Coe

(This is a pseudonym. An affidavit signed with my legal name is on file with my attorneys.)